



Christopher Heimann
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Assistant General Counsel

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Washington, D.C. 20036
Phone 202 457-3058
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July 28, 2016

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Cable Special Relief Petitions; MB Docket No. 12-1

Dear Ms. Dortch:

Consistent with the Market Modification docket referenced above, attached are results for a preliminary evaluation of a potential market modification for stations KUSA, KTVD, KCNC, KDVR, KWGN, KMGH, KZCO and KRMA in La Plata County, CO.

If you have any questions, feel free to contact me at (202) 457-3058.

Sincerely,

/s/ Christopher M. Heimann



July 22, 2016

Via E-mail and FedEx

La Plata County Board of County Commissioners
La Plata County
1101 E. 2nd Ave.
Durango, CO 81301
joanne.spina@co.laplata.co.us

Dear La Plata County Board of County Commissioners:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for stations KUSA, KTVD, KCNC, KDVR, KWGN, KMGH, KZCO, and KRMA in La Plata County, CO.

DIRECTV's engineering staff was given the areas to evaluate for our Denver, CO spot beams, and have found that:

- DIRECTV's HD spot beam does not cover **7** zip codes in La Plata County

DIRECTV will forward the results of this preliminary evaluation to the FCC for their records.

Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

DIRECTV

Form of Certification Regarding Spot Beam Coverage

1. My name is Phil Goswitz. I am SVP of Engineering at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
KCNC	CO	LA PLATA

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:

- The measured performance of the spot beam covering this Television Station's local market.
- Estimated atmospheric effects for reception of the signal.
- Estimated levels of interference.
- The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
- The target availability figure used for all television stations offered on the spot beam.

4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:

- Signal availability.
- Clear sky signal margin.
- Total carrier-to- interference ratio.

5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.

6. Based on this analysis, DIRECTV:

- ☐ HD ☒ SD Can provide service to all the zip codes associated with this request.*
- ☐ HD ☐ SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- ☒ HD ☐ SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

* IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7-17-16
Date

Signature

Monday, July 18, 2016

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KDVR	CO	LA PLATA

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KMGH	CO	LA PLATA

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KRMA	CO	LA PLATA

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KTVD	CO	LA PLATA

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KUSA	CO	LA PLATA

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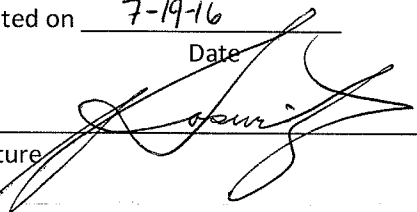
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KWGN	CO	LA PLATA

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KZCO-LP	CO	LA PLATA

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Station	Zip	USPSFIPS	State	County	HD Covered	HD Evaluation Completed
KCNC	81137	08067	CO	LA PLATA	No	7/13/2016
KCNC	81301	08067	CO	LA PLATA	No	7/13/2016
KCNC	81302	08067	CO	LA PLATA	No	7/13/2016
KCNC	81303	08067	CO	LA PLATA	No	7/13/2016
KCNC	81326	08067	CO	LA PLATA	No	7/13/2016
KCNC	81328	08067	CO	LA PLATA	No	7/13/2016
KCNC	81329	08067	CO	LA PLATA	No	7/13/2016
KDVR	81137	08067	CO	LA PLATA	No	7/13/2016
KDVR	81301	08067	CO	LA PLATA	No	7/13/2016
KDVR	81302	08067	CO	LA PLATA	No	7/13/2016
KDVR	81303	08067	CO	LA PLATA	No	7/13/2016
KDVR	81326	08067	CO	LA PLATA	No	7/13/2016
KDVR	81328	08067	CO	LA PLATA	No	7/13/2016
KDVR	81329	08067	CO	LA PLATA	No	7/13/2016
KMGH	81137	08067	CO	LA PLATA	No	7/13/2016
KMGH	81301	08067	CO	LA PLATA	No	7/13/2016
KMGH	81302	08067	CO	LA PLATA	No	7/13/2016
KMGH	81303	08067	CO	LA PLATA	No	7/13/2016
KMGH	81326	08067	CO	LA PLATA	No	7/13/2016
KMGH	81328	08067	CO	LA PLATA	No	7/13/2016
KMGH	81329	08067	CO	LA PLATA	No	7/13/2016
KRMA	81137	08067	CO	LA PLATA	No	7/13/2016
KRMA	81301	08067	CO	LA PLATA	No	7/13/2016
KRMA	81302	08067	CO	LA PLATA	No	7/13/2016
KRMA	81303	08067	CO	LA PLATA	No	7/13/2016
KRMA	81326	08067	CO	LA PLATA	No	7/13/2016
KRMA	81328	08067	CO	LA PLATA	No	7/13/2016
KRMA	81329	08067	CO	LA PLATA	No	7/13/2016
KTVB	81137	08067	CO	LA PLATA	No	7/13/2016
KTVB	81301	08067	CO	LA PLATA	No	7/13/2016
KTVB	81302	08067	CO	LA PLATA	No	7/13/2016
KTVB	81303	08067	CO	LA PLATA	No	7/13/2016
KTVB	81326	08067	CO	LA PLATA	No	7/13/2016
KTVB	81328	08067	CO	LA PLATA	No	7/13/2016
KTVB	81329	08067	CO	LA PLATA	No	7/13/2016
KUSA	81137	08067	CO	LA PLATA	No	7/13/2016
KUSA	81301	08067	CO	LA PLATA	No	7/13/2016
KUSA	81302	08067	CO	LA PLATA	No	7/13/2016
KUSA	81303	08067	CO	LA PLATA	No	7/13/2016
KUSA	81326	08067	CO	LA PLATA	No	7/13/2016
KUSA	81328	08067	CO	LA PLATA	No	7/13/2016
KUSA	81329	08067	CO	LA PLATA	No	7/13/2016
KWGN	81137	08067	CO	LA PLATA	No	7/13/2016
KWGN	81301	08067	CO	LA PLATA	No	7/13/2016
KWGN	81302	08067	CO	LA PLATA	No	7/13/2016
KWGN	81303	08067	CO	LA PLATA	No	7/13/2016
KWGN	81326	08067	CO	LA PLATA	No	7/13/2016
KWGN	81328	08067	CO	LA PLATA	No	7/13/2016
KWGN	81329	08067	CO	LA PLATA	No	7/13/2016
KZCO	81122	08067	CO	LA PLATA	No HD channel available	
KZCO	81137	08067	CO	LA PLATA	No HD channel available	
KZCO	81301	08067	CO	LA PLATA	No HD channel available	
KZCO	81302	08067	CO	LA PLATA	No HD channel available	
KZCO	81303	08067	CO	LA PLATA	No HD channel available	
KZCO	81326	08067	CO	LA PLATA	No HD channel available	
KZCO	81328	08067	CO	LA PLATA	No HD channel available	
KZCO	81329	08067	CO	LA PLATA	No HD channel available	
KZCO-LP	81122	08067	CO	LA PLATA	No HD channel available	
KZCO-LP	81137	08067	CO	LA PLATA	No HD channel available	
KZCO-LP	81301	08067	CO	LA PLATA	No HD channel available	
KZCO-LP	81302	08067	CO	LA PLATA	No HD channel available	
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